

**UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND**

WENDELLA SIGHTSEEING COMPANY, INC.,)	
)	
Plaintiff,)	
)	
vs.)	Case No.: 1:17-cv-00388-S-LDA
)	
BLOUNT BOATS, INC.,)	
)	
Defendant.)	

**PLAINTIFF, WENDELLA SIGHTSEEING COMPANY, INC.'S,
MOTION TO VACATE ARBITRATION AWARD**

NOW COMES Plaintiff, Wendella Sightseeing Company, Inc., and hereby moves this Honorable Court¹, pursuant to Rhode Island General Laws §§ 10-3-12 – 10-3-15, for an Order vacating an arbitration award dated July 5, 2017. As grounds for this Motion, Plaintiff relies on its Memorandum of Law in Support of Its Motion to Vacate Arbitration Award filed contemporaneously herewith.

REQUEST FOR ORAL ARGUMENT PURSUANT TO LOCAL RULE CV 7(e)

Plaintiff hereby requests oral argument on its Motion. Plaintiff estimates no more than forty-five (45) minutes would be necessary for oral argument. Plaintiff also reserves its right to request an evidentiary hearing following discovery on the issues raised in the Supporting Memorandum.

¹ On August 28, 2017, Plaintiff filed a Motion to Remand its Miscellaneous Petition to Vacate Arbitration Award from this Court to the Rhode Island Superior Court, Providence County, where it was originally filed. Plaintiff respectfully submits that the Rhode Island Superior Court, Providence County, should hear and decide Plaintiff's Motion to Vacate the Arbitration Award.

WENDELLA SIGHTSEEING COMPANY, INC.
By its Attorneys,

/s/ J. David Freel

Paul S. Callaghan, Esq. #4931
J. David Freel, Esq., #7977
HIGGINS, CAVANAGH & COONEY, LLP
10 Dorrance Street, Suite 400
Providence, RI 02903
(401) 272-3500
(401) 273-8780 (fax)
pcallaghan@hcc-law.com
dfreel@hcc-law.com

and

/s/ Stuart P. Krauskopf

Stuart P. Krauskopf, *Pro Hac Vice*
Krauskopf Kauffman, P.C.
414 North Orleans Street, Suite 210
Chicago, IL 60654
(312) 377-9592
(312) 264-5618 (fax)
stu@stuklaw.com

CERTIFICATE OF SERVICE

I hereby certify that an exact copy of the within document was electronically submitted to the Electronic Case Filing System of the United States District Court for its distribution to the following counsel of record on this 1st day of September 2017:

Robert M. Duffy, Esquire
DUFFY & SWEENEY, LTD
One Financial Plaza, Suite 1800
Providence, RI 02903

/s/ Angela M. DiCarlo